



# HOME CONSULTANCY Ltd.

## **AFFORDABLE HOUSING STATEMENT FOR LAND AT WANDLEYS FARM , WANDLEYS LANE, FONTWELL**

PREPARED BY

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| <b>24/09/2017</b> |  | Home Consultancy Ltd |

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# 1.0 Introduction

- 1.1 I have been instructed to provide an Affordable Housing Statement to be submitted as additional information in support of the planning application submitted in respect of land at Wandleys Farm, Wandleys Lane, Fontwell for 5 homes of which 80% will be provided as affordable housing, delivering 4 affordable homes (consisting of 4 intermediate affordable housing units for sale.)
- 1.2 This Statement includes an assessment of relevant Development Plan policies, material considerations and other guidance that is relevant to the site and proposed development, and provides justification for the grant of permission. In doing so it defines the housing needs that will be met by the developer, together with details of its affordable housing offer.
- 1.3 It should be read alongside the scheme drawings by Roger Harden Design Consultants and a number of reports prepared by specialist consultants.
- 1.4 This statement comprises 6 sections:
- Section 2 details the site and its surroundings;
  - Section 3 defines the planning policy framework in the form of the Development Plan and any material considerations;
  - Section 4 provides an analysis of a recently carried out Housing Needs Survey
  - Section 5 provides details on the scheme including details of the Affordable Housing proposed.
  - Section 6 explains what Intermediate Affordable Housing is.

## 2.0 Site and Surroundings

- 2.1 The application site is approximately 0.95 ha in size, and it sits on the southern side of Wandleys Lane, south of Wandleys Farm.
- 2.2 The site is mainly open in character but forms an infill between two farmsteads. The site is bounded by an existing field enclosure and is fronted by a hedgerow reflecting the rural character of this area. The southern boundary of this development consists mainly of established hedgerow interspersed with trees.
- 2.3 The site is located on Wandleys Lane which forms a route between the A29 and the junction of Walberton Lane with the Arundel Road. The site sits within the district of Arun.
- 2.4 Fontwell and Walberton are supported by a range of small shops including the village stores in Fontwell, Walberton Post Office, Walberton Village Stores and a number of other independent stores/services.
- 2.5 Walberton Parish within both the Arun District Council (ADC) and South Downs National Park Authority (SDNPA) areas. The Local Planning Authority is ADC. .

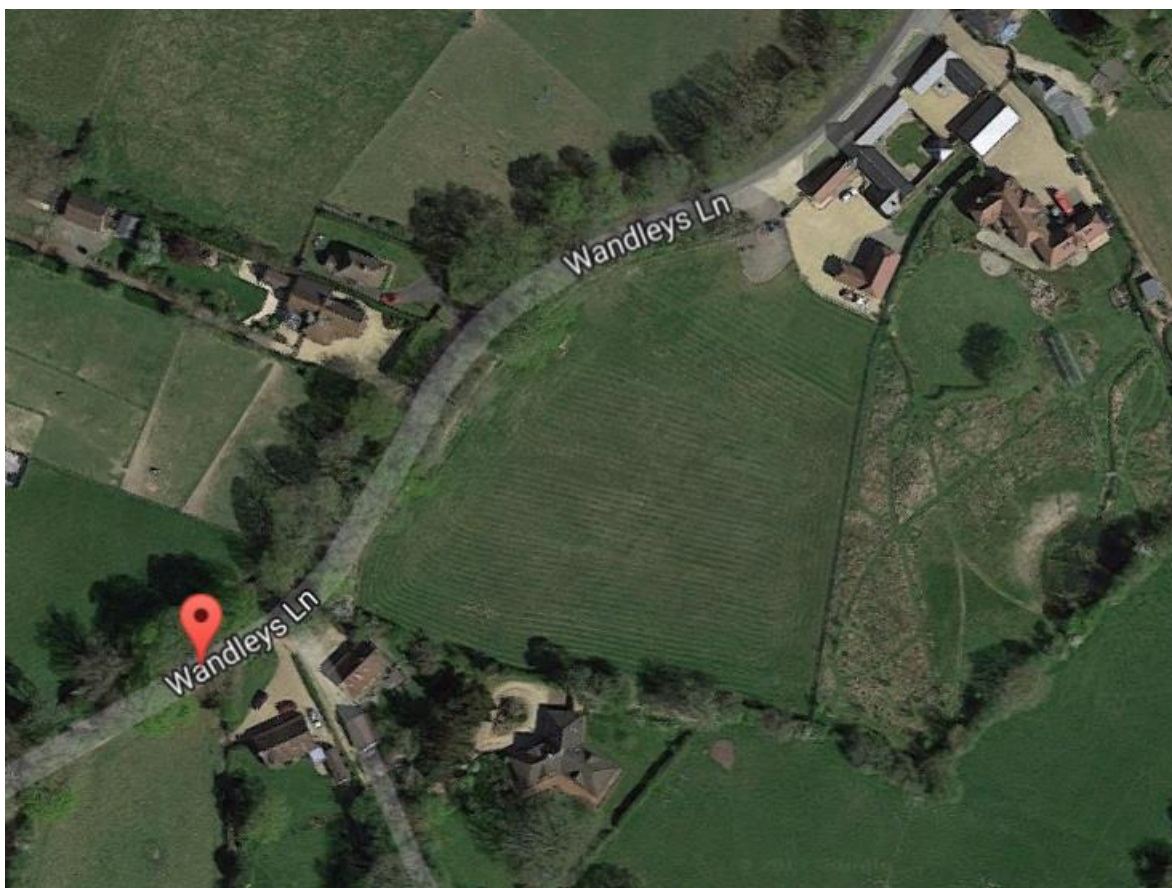


*Figure 2.1: Site Location Plan*

## 3.0 Planning Policy Framework

### Introduction

- 3.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.2 The Development Plan for the purposes of this application in Arun district includes:
- the saved policies of the adopted Arun District Local Plan 2003
  - any adopted Neighbourhood Plan
- 3.3 Following the enactment of the Localism Act 2011 and the introduction of the Town and Country Planning (Local Planning) (England) Regulations 2012 in March 2012, all planning policy documents are now known as local development documents and collectively make up the Local Plan. Arun District Council are currently producing a new plan.
- 3.4 The Arun District Local Plan 2011-2031 and supporting documents were submitted for independent examination to the Secretary of State for Communities and Local Government via the Planning Inspectorate on 30 January 2015.
- 3.5 The plan is in the process of being examined by Mark Dakeyne and the hearing dates are listed as 19-21 September 2017 and 25-28 September 2017 with Thursday 21 September 2017 at 1330 hours covering Matter 4b "Housing - Affordable & Other Housing Needs, Mix and Standards"
- 3.6 Policy DEV 18 of the 2003 District Local Plan confirms that: *"Proposals for affordable housing will be permitted on sites in the rural area, provided that: there are no other policy constraints upon development except the location of the site outside the built-up area, the Local Planning Authority is satisfied that a need exists in the locality for affordable housing and the development meets the needs of the existing residents of a particular parish, requiring separate accommodation and the development does not contain any element of private housing for sale or rent on the open market."*

- 3.7 Given the wording contained in this policy *“development does not contain any element of private housing for sale or rent on the open market”* a further enquiry on the status of this policy (given its adoption date of 2003) was made of the Local Authority and confirmation was received on 12 September 2017 from Andy Elder who confirmed that *“Details of the Council’s Emerging Local Plan can be found on our web site at [www.arun.gov.uk/emerging-local-plan](http://www.arun.gov.uk/emerging-local-plan). Policy H SP3 is the Rural housing and exceptions sites policy and is currently a material consideration for the Council’s Planning Officers. This does contain information on the use of market housing as part of an exception sites application”*
- 3.8 Policy H SP3 of the emerging plan confirms that *“Housing on rural exception sites will be permitted where the site is located within a parish with an identified level of housing need following the undertaking of a Local Housing Needs Survey”*.
- 3.9 The policy also does not state the “private housing for sale or rent” is unacceptable just that it must be in accordance with the published housing needs survey.

#### **Other Material Considerations**

#### **National Planning Policy Framework**

- 3.10 The National Planning Policy Framework (NPPF) was published in March 2012 and introduced a *“presumption in favour of sustainable development”* and replaced most other existing national planning policy guidance (as previously covered through PPGs, PPSs and Circulars).

3.11 The following elements of the NPPF are of particular relevance:

| Section No. | Commentary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 14          | A presumption in favour of sustainable development to decision making.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 47          | Maintains a commitment to 'significantly' boosting the supply of housing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 49          | Where development plan policies are failing to maintain sufficient supply, the NPPF directs that they should be deemed out of date for the purpose of the presumption in favour of sustainable development being applied to the determination of planning applications.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 47          | The NPPF also requires authorities to illustrate how this will be delivered in the form of a housing trajectory for market and affordable housing, and set out a housing implementation strategy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 47 and 50   | Local authorities need to produce robust evidence to support their chosen threshold and prove it is viable. On-site provision of affordable housing is described in the NPPF as 'default'.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Annex 2     | <p>Defines affordable housing for planning purposes as:</p> <p><i>"Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</i></p> <p><i>Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.</i></p> <p><i>Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).</i></p> <p><i>Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing.</i></p> |

|            |                                                                                                                                                                                  |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            | <i>Homes that do not meet the above definition of affordable housing, such as 'low-cost market' housing, may not be considered as affordable housing for planning purposes."</i> |
| 159 and 47 | Reinforces the importance of Strategic Housing Market Assessments (SHMA) and Strategic Housing Land Availability Assessments (SHLAA) as background evidence to policy creation;  |

### Planning Practice Guidance

3.12 The Planning Practice Guidance (PPG) was first published online on the 6 March 2014. The PPG replaces the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance in the application of the NPPF.

3.13 The following elements of the PPG are of particular relevance.

| Section                                                    | Commentary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Housing and Economic Land Availability Assessment para 45  | Confirms that Local Authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs. However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.                                                                            |
| Housing and economic development needs assessments para 14 | Establishing future need for housing is not an exact science. No single approach will provide a definitive answer. Plan makers should avoid expending significant resources on primary research (information that is collected through surveys, focus groups or interviews etc and analysed to produce a new set of findings) as this will in many cases be a disproportionate way of establishing an evidence base. They should instead look to rely predominantly on secondary data (eg Census, national surveys) to inform their assessment which are identified within the guidance. |
| Housing and economic development needs assessments para 15 | Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.                                                                                                                                                                                                                                                                                                                                                                                                                               |

## Emerging Walberton Neighbourhood Development Plan

- 3.14 The Parish of Walberton covers an area of 1,044.19 hectares (2,580.25 acres) and has a population of some 2,175 in its three villages of Walberton, Binsted and Fontwell. In 2012, the Localism Act gave powers to parish councils to involve their communities in the creation of neighbourhood development plans, in order to give them a greater say in planning matters.
- 3.15 Walberton Parish Council set up a steering group to do this. The steering group ensured that parishioners had a real say in the preparation of this Walberton Neighbourhood Development Plan (the Plan). It is a plan for the future of the Parish that reflects parishioners' views about what changes should occur in their area, rather than leaving such decisions to the local planning authorities – Arun District Council and the South Downs National Park Authority
- 3.16 The NP was published in October 2015 and examined and reported in July 2016. The inspector accepted some of the policies in the draft NP but not all of them and therefore the Parish has now published a Neighbourhood Development Plan post examination which can be found at: <http://walberton.org.uk/wp-content/uploads/2017/01/Walberton-NDP-POST-Exam-20-Dec-2016.pdf>
- 3.17 The Parish decided not to proceed with a referendum because there was a difference of opinion between the Parish and Arun District Council on some of the items accepted by the Inspector and this debate is currently continuing.
- 3.18 However, there are some principles within the draft NP that have been agreed by the Inspector and Arun which form some 'guiding principles' on which development proposals should be assessed, such as:
- avoiding development on large sites
  - to disperse the new housing on several smaller sites and avoid urbanising the villages
  - to provide a mix of new housing including smaller and sheltered units for those wishing to downsize and affordable starter homes

- giving priority to local residents or those with a local connection
- to ensure that all new building is of a design compatible with adjoining properties and its setting

3.19 NP - Policy HP 10 Affordable Housing confirms that *“Across the Parish, the aspiration is to achieve at least 25% Affordable Housing increasing over time to up to 40%. This reflects concern regarding the Parish residents’ current older demographic bias and the social and economic benefits to be had from encouraging the younger, working-age demographic”*

3.20 Supporting text to this document also confirmed that *“The Examiner has not accepted the evidence of the need for affordable housing in the Survey carried out by the PC. As part of the ongoing process for the review of the NP the PC has commissioned a Housing Needs Survey from AiRS”.*

3.21 *Following this Statement, Walberton Parish Council decided not to proceed with AiRS and therefore a housing needs survey was commissioned from Landspeed Limited which is attached at Appendix 1 to this report.*

## 4.0 Housing Needs Survey

- 4.1 The housing needs survey was hand delivered to all residential dwellings in the parish with a deadline of the 18<sup>th</sup> August 2017 and sufficient opportunity was given to local residents to return the information as pre-paid envelopes were provided and 4 collection points.
- 4.2 To ensure impartiality in the results and to make sure that all the results were included the survey data was opened in the presence of one of the Neighbourhood Plan steering group members.
- 4.3 In all 175 forms were received by the deadline and, of these, 169 included at least one answered question. The remaining 6 were blank aside from comments.
- 4.4 Over 850 were distributed so this represents a 20% response rate. Further responses were received after the closing date and therefore were not recorded.
- 4.5 Question 3 enquired *“Would you like to own your own home but cannot afford to buy one in Walberton Parish that suits your needs”*. The survey results indicated that 11 current households could not afford to purchase one in the local area.
- 4.6 Question 10 enquired *“Do you have any family or dependents (either living with you or elsewhere) who wish to purchase their own home in Walberton Parish, but who cannot afford to buy in the open market?”* The survey results indicated that there were 32 households that fell under this category.
- 4.7 Question 11 enquired *“Do you know of anyone who works in Walberton Parish but who cannot afford to live in the village?”* The survey results indicated that there were 27 households that fell under this category.
- 4.8 Question 12 enquired *“To your knowledge have you, or any of those indicated as being unable to afford a suitable home in Walberton Parish, registered this need with either Arun District Council or any of their housing association partners”* Of the 70 responses received only 3 households had registered this need.

- 4.9 From the survey results it can be deduced that there is pent up demand for affordable housing for local residents which at a minimum would be 11 households and at a maximum would be 70 households.

## 5.0 Accommodation proposed

5.1 The following mix of affordable housing is proposed for the site:

| Plot | No. Beds | Type                             | m2 | Tenure                          |
|------|----------|----------------------------------|----|---------------------------------|
| 1    | 2        | Semi-detached 2 bedroom bungalow | 70 | Intermediate Affordable Housing |
| 2    | 2        | Semi-detached 2 bedroom bungalow | 70 | Intermediate Affordable Housing |
| 3    | 2        | Semi-detached 2 bedroom bungalow | 70 | Intermediate Affordable Housing |
| 4    | 2        | Semi-detached 2 bedroom bungalow | 70 | Intermediate Affordable Housing |

5.2 The overall tenure and unit size split on this site is as follows:

|                                        | 1 bed | 2 bed | 3 bed | 4+ bed |
|----------------------------------------|-------|-------|-------|--------|
| <b>Open Market</b>                     | 0     | 0     | 0     | 1      |
| <b>Intermediate Affordable Housing</b> | 0     | 4     | 0     | 0      |

## 6.0 Intermediate Affordable Housing

- 6.1 The definition of Intermediate Affordable Housing is contained within the National Planning Policy Framework at Annex 2.
- 6.2 The definition is as follows: “Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing”
- 6.3 There is no requirement for the delivery body to be a Registered Provider or a Housing Association.
- 6.4 In this case a private provider of Affordable Housing will provide 4 x 2 bed bungalows for the local market at up to 75% of market value.
- 6.5 The usual practice is for Registered Providers and Housing Associations to charge rent on top of the sales price under Shared Ownership arrangements.
- 6.6 In this circumstance the provider will not charge rent on the unsold equity and will hold onto their equity as a charge on the property.
- 6.7 In delivering 4 x 2 bed units for Intermediate Housing for sale that are bungalows this provides the opportunity for those properties to either be taken up by newly forming households who cannot afford to purchase locally or allow someone to remain in the village whilst releasing funds from their house to pay for essential care in their old age.
- 6.8 These restrictions can be controlled by way of clauses within the s106 agreement and the developer is willing to provide further comfort through the use of a local connections criteria to assist local residents in achieving their housing aspirations.
- 6.9 A draft set of definitions and operational schedule for inclusion in the s106/UU is attached.